

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	:	Bankruptcy Case No. 20-12768-pmm
	:	
	:	Chapter 13
John C. Borschel <i>aka John Clifton Borschel</i>	:	
Debtor.	:	Judge: Patricia M. Mayer
	:	
SN Servicing Corporation as Servicer for U.S.	:	
Bank Trust National Association as Trustee of	:	
the Chalet Series III Trust	:	
Movant	:	
	:	
John C. Borschel <i>aka John Clifton Borschel</i>	:	
Scott F. Waterman - Trustee	:	
Respondents.	:	
	:	

**CONSENT ORDER RESOLVING  
MOTION TO ALLOW LATE FILING OF PROOF OF CLAIM**

This \_\_\_\_ day of \_\_\_\_, 20\_\_, the Consent Order regarding the filing of a late Proof of Claim by SN Servicing Corporation is hereby **APPROVED** and entered as an **ORDER OF COURT**.

BY THE COURT:

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J.

Applicant: SN Servicing Corporation  
Applicant's Counsel: Friedman Vartolo LLP  
Debtor's Counsel: Stephen J. Palopoli, III  
Property (Collateral): 1730 Blue Barn Road, Orefield, PA 18069

For good cause shown, the late claim is allowed, and the debtor is set to repay the total claim over a 60-month plan term, subject to the following conditions:

- First year:  $\$1,000.00 \times 12 \text{ months} = \$12,000.00$
- Second year:  $\$1,250.00 \times 12 \text{ months} = \$15,000.00$
- Third year:  $\$1,500.00 \times 12 \text{ months} = \$18,000.00$
- Fourth year:  $\$1,750.00 \times 12 \text{ months} = \$21,000.00$
- Fifth year: Borrower to pay the remaining claim amount of \$26,234.46 over 11 months at \$2,186.21 per month with one final payment of \$2,186.15
- **Total Claim Amount** = \$92,234.46

Payments to the Secured Creditor shall be made to the following address:

Payments: SN Servicing Corporation  
P.O. Box 660820  
Dallas, TX 75266

- In the event of default:

If the Debtor fails to make the regular monthly payments within thirty (30) days of the date the payments are due, then the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, Certification specifying the Debtor's failure to comply with this Order. At the time the Certification is filed with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtor(s), and the Debtor(s)'s Attorney.

The undersigned hereby consent to the form and entry of the foregoing order.

/s/ Stephen J. Palopoli  
Stephen J. Palopoli, III, Esq.  
*Attorney for Debtor*

/s/ Lorraine Gazzara Doyle  
Lorraine Gazzara Doyle, Esq.  
*Attorney for Secured Creditor*